

# EXHIBIT

## “N”

Law Office of Nathaniel B. Smith  
 100 Wall Street - 23rd Floor  
 New York, NY 10005

Invoice submitted to:  
 Schoolcraft

November 25, 2015

Invoice #10032

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2013	MB	Initial meeting with Peter Gleason and Jeremy Skehan.	2.00 150.00/hr	300.00
3/5/2013	MB	Meeting with Peter Gleason re: coming on board the Schoolcraft team.	3.00 150.00/hr	450.00
3/9/2013	MB	Meeting with Peter and Nat re briefing of the case.	3.00 150.00/hr	450.00
3/15/2013	MB	Started research on admissibility of demonstrative evidence story board project.	6.00 150.00/hr	900.00
3/27/2013	MB	Conference with Peter, Nat, and Artist re Story Board project.	3.00 150.00/hr	450.00
4/1/2013	MB	Memo to counsel re: research on prior restraint in resppnse to motion for gag order.	6.00 150.00/hr	900.00
4/7/2013	MB	Meeting with Adrian and team in Saugerties (travel to and from meeting 4 hours).	8.00 150.00/hr	1,200.00
8/1/2013	MB	Meeting with Nat re: jury instructions project.	3.00 150.00/hr	450.00
8/2/2013	MB	Review Complaint, record, and prior case decisions.	7.00 150.00/hr	1,050.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/5/2013	MB	Jury instructions project: research fundamentals of 1983 litigation and federal causes of action; review commentary Bender and Schwartz; causation by multiple defendants; collect cases for authority.	5.00 150.00/hr	750.00
8/6/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
8/7/2013	MB	Prep for meeting with illustrator re demonstrative project; meeting with potential "dangerousness expert," Tom Litwack.	7.00 150.00/hr	1,050.00
8/12/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
8/13/2013	MB	Meeting with Nat at 3pm re update on projects	3.00 150.00/hr	450.00
8/14/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
8/19/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
8/20/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
8/21/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
8/23/2013	MB	Meeting with Nat at 5pm re state action research project	3.00 150.00/hr	450.00
8/26/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
8/27/2013	MB	Team meeting with Adrian in Saugerties. (Travel time 4.5 hours)	10.00 150.00/hr	1,500.00
8/29/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
9/1/2013	MB	Nat's office, listen to audios and review production.	3.00 150.00/hr	450.00
9/3/2013	MB	Jury instructions project.	5.00 150.00/hr	750.00
9/5/2013	MB	Preparing detailed timelines for case on plaintiff's entire work history; NYPD work history; hospital events and events of 10-31-09.	5.00 150.00/hr	750.00
9/6/2013	MB	Timeline Project.	5.00 150.00/hr	750.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/9/2013	MB	Timeline Project.	5.00 150.00/hr	750.00
9/11/2013	MB	Timeline Project.	5.00 150.00/hr	750.00
9/12/2013	MB	Timeline Project.	5.00 150.00/hr	750.00
9/13/2013	MB	Meeting with Nat 4:30pm re update of current projects	3.00 150.00/hr	450.00
9/18/2013	MB	Meeting with Nat and Adrian	2.00 150.00/hr	300.00
9/19/2013	MB	Inspection of 81st Precinct	6.00 150.00/hr	900.00
9/24/2013	MB	Meeting with Adrian to work on layout of Glendale apt.	3.00 150.00/hr	450.00
9/25/2013	MB	Oral Argument; team meeting	4.00 150.00/hr	600.00
9/26/2013	MB	Deposition of the plaintiff.	11.00 150.00/hr	NO CHARGE
9/27/2013	MB	Deposition of the plaintiff by the medical defendants.	12.00 150.00/hr	NO CHARGE
10/2/2013	MB	Jamaica Hospital inspection.	6.00 150.00/hr	900.00
10/3/2013	MB	Prepare Marino examination before trial; compile relevant discovery docs into searchable PDF; review record and prepare questions	5.00 150.00/hr	750.00
10/4/2013	MB	Prepare Marino examination before trial.	5.00 150.00/hr	750.00
10/7/2013	MB	Prepare Marino examination before trial.	5.00 150.00/hr	750.00
10/8/2013	MB	Deposition of Deputy Chief Michael Marino.	12.00 150.00/hr	NO CHARGE
10/10/2013	MB	Research caselaw on involuntary commitments involving private hospitals	5.00 150.00/hr	750.00
10/11/2013	MB	Research involuntary commitments and MHL 9.39.	5.00 150.00/hr	750.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/14/2013	MB	Prepare medical defendants examination before trial; review medical chart and record; review depositions of City defendants; review hospital policy and procedure; review MHL 9.39; draft deposition questions.	5.00 150.00/hr	750.00
10/15/2013	MB	Prepare medical defendants examination before trial.	5.00 150.00/hr	750.00
10/16/2013	MB	Judge Sweet's courtroom hearing.	3.00 150.00/hr	450.00
10/17/2013	MB	Prepare medical defendants examination before trial.	3.00 150.00/hr	450.00
10/18/2013	MB	Research involuntary commitments and due process violations; brief cases.	5.00 150.00/hr	750.00
10/21/2013	MB	Prepare medical defendants examination before trial.	6.00 150.00/hr	900.00
10/22/2013	MB	Prepare medical defendants examination before trial.	5.00 150.00/hr	750.00
10/23/2013	MB	Prepare medical defendants examination before trial.	5.00 150.00/hr	750.00
10/24/2013	MB	Meeting with Nat re status on projects	3.00 150.00/hr	450.00
10/25/2013	MB	Dr. Aldana-Berner; deposition was cancelled.	2.50 150.00/hr	375.00
10/28/2013	MB	Research re: defendant's objection to plaintiff's use of video at deposition; research Rule 30, Rule 28(c), CPLR 3313 (b).	5.00 150.00/hr	750.00
10/29/2013	MB	Research video deposition Rule 30.	5.00 150.00/hr	750.00
10/30/2013	MB	Research video deposition Rule 30.	5.00 150.00/hr	750.00
10/31/2013	MB	Memo to counsel re; research video deposition Rule 30.	5.00 150.00/hr	750.00
11/1/2013	MB	Prepare Lauterborn examination before trial; review record; listen to audios; compile discovery docs into searchable PDF; draft deposition questions.	5.00 150.00/hr	750.00
11/4/2013	MB	Prepare Lauterborn examination before trial.	5.00 150.00/hr	750.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/5/2013	MB	Prepare Lauterborn examination before trial.	5.00 150.00/hr	750.00
11/6/2013	MB	Prepare Lauterborn examination before trial.	5.00 150.00/hr	750.00
11/7/2013	MB	Lauterborn deposition.	11.00 150.00/hr	NO CHARGE
11/8/2013	MB	Review discovery, catalog, and convert to searchable PDF files.	5.00 150.00/hr	750.00
11/9/2013	MB	Review discovery, organize, and convert to searchable files.	5.00 150.00/hr	750.00
11/11/2013	MB	Review discovery, catalog, and convert to searchable PDF files.	5.00 150.00/hr	750.00
11/12/2013	MB	Canvas Glendale neighborhood with Terry; interview Adrian's next door neighbor and current resident of Glendale apt.; take photos.	5.00 150.00/hr	750.00
11/13/2013	MB	Judge Sweet's courtroom hearing.	5.00 150.00/hr	750.00
11/14/2013	MB	Prepare Mauriello examination before trial; review record; listen to audios;compile discovery docs into searchable PDF; draft deposition questions.	5.00 150.00/hr	750.00
11/15/2013	MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
11/18/2013	MB	Interview with Carol Stremoyer at Midtown location (w/Terry Skinner).	3.00 150.00/hr	450.00
11/20/2013	MB	Interview with Ted Stremoyer at Glendale apt. (with Terry Skinner).	3.00 150.00/hr	450.00
11/21/2013	MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
11/22/2013	MB	Mauriello deposition cancelled; begin Prof Rule 4.2 no contact research.	4.50 150.00/hr	675.00
11/24/2013	MB	Prof Rule 4.2 no contact research; issues include: when gov. employees are considered "parties" under Rule 4.2 and when employees are considered "represented."	3.00 150.00/hr	450.00
11/25/2013	MB	Prof Rule 4.2 no contact research.	6.00 150.00/hr	900.00
11/26/2013	MB	Draft memo to counsel re: Prof Rule 4.2 no contact research.	6.00 150.00/hr	900.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2013	MB	Rule 30(c)(2) research; issues include: Rule 612; the production of documents relied on during deposition; attorney-client privilege; relevancy under Rule 26.	5.00 150.00/hr	750.00
11/30/2013	MB	Rule 30(c)(2) research re: discoverable disciplinary records; convictions; sanctions; applying state law privileges.	5.00 150.00/hr	750.00
12/2/2013	MB	Rule 30(c)(2) research.	5.00 150.00/hr	750.00
12/3/2013	MB	Draft memo to counsel re: Rule 30(c)(2) research.	5.00 150.00/hr	750.00
12/4/2013	MB	Draft memo to counsel re: Rule 30(c)(2) research.	5.00 150.00/hr	750.00
12/5/2013	MB	Write up on all deposition objection issues.	5.00 150.00/hr	750.00
12/6/2013	MB	Write up on all deposition objection issues.	5.00 150.00/hr	750.00
12/10/2013	MB	Prepare Larry Schoolcraft examination before trial.	5.00 150.00/hr	750.00
12/11/2013	MB	Larry Schoolcraft deposition in Albany, NY. (travel 6.5 hours).	16.00 150.00/hr	2,400.00
12/12/2013	MB	Review discovery, organize, and convert to searchable files.	5.00 150.00/hr	750.00
12/13/2013	MB	Review discovery, organize, and convert to searchable files; listen to audio.	5.00 150.00/hr	750.00
12/16/2013	MB	Prepare Mauriello examination before trial; review documents; create searchable PDF; review depositions and record; listen to audio.	5.00 150.00/hr	750.00
12/17/2013	MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
12/18/2013	MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
12/19/2013	MB	Prepare Mauriello examination before trial.	5.00 150.00/hr	750.00
12/20/2013	MB	Mauriello deposition.	11.00 150.00/hr	NO CHARGE
12/22/2013	MB	Meeting with Adrian Schoolcraft re: demonstrative evidence project.	3.00 150.00/hr	450.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/24/2013	MB Meeting with Team and Adrian Schoolcraft.	3.00 150.00/hr	450.00
12/26/2013	MB Meeting with Adrian re demonstrative evidence project; joined by John Lenoir.	3.00 150.00/hr	450.00
12/27/2013	MB Meeting with Adrian Schoolcraft re demonstrative evidence project.	3.00 150.00/hr	450.00
12/29/2013	MB Meeting at Nat's office w/ Adrian; review audio and record.	4.00 150.00/hr	600.00
12/30/2013	MB Meeting at Nat's office w/ Adrian; review audio and record.	3.00 150.00/hr	450.00
For professional services rendered		501.00	\$66,600.00
Balance due			\$66,600.00

# Detailed report

2014-01-01 - 2014-12-31

Total 547 h 29 min Billable 461 h 28 min 69221.08 USD



Schoolcraft selected as clients

Date	Description	Duration	User
01-03	<b>Prepare for Huffman and Boston Deposition; review discovery docs; draft questions.</b>	<b>4:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:02-14:32	675 USD
01-05	<b>Prepare for Boston and Huffman Deposition.</b>	<b>6:02:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:07-16:09	905 USD
01-06	<b>Boston Deposition.</b>	<b>4:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-14:00	
01-06	<b>Huffman Deposition.</b>	<b>4:15:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-18:15	
01-06	<b>Team meeting re review of Boston and Huffman depositions.</b>	<b>1:45:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	19:15-21:00	262.5 USD
01-10	<b>Review and catalog discovery production at Nat's office; listen to Hanlon audio.</b>	<b>6:59:18</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-18:00	1048.25 USD
01-12	<b>Analyze NYPD emergency protocol; review NYPD Patrol guide.</b>	<b>2:14:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:46-16:00	335 USD
01-12	<b>Prepare for Hanlon's deposition; review EMT emergency procedure and discovery documents.</b>	<b>4:08:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:37-21:45	620 USD
01-13	<b>Hanlon's Deposition.</b>	<b>7:59:10</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-18:00	
01-15	<b>Hearing with Judge Sweet re discovery issues; team meeting re status of case.</b>	<b>2:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:00	300 USD
01-28	<b>Prepare for Lamstein deposition; review handwritten notes in discovery docs; draft questions.</b>	<b>3:44:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:15-20:59	560 USD
01-29	<b>Meeting Nat's Office re: review and prep for Lamstein EBT.</b>	<b>4:00:01</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-18:00	600.04 USD
01-30	<b>Lamstein Deposition.</b>	<b>10:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-20:00	1500 USD
02-03	<b>Research inadvertent production and ethics on production obligation; search files and remove discovery documents in question.</b>	<b>6:05:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:12-18:17	912.5 USD
02-04	<b>Research inadvertent production and ethics on production obligation; research Rule 502, Fed. R. Civ. P. 26(b)(5)(B) and caselaw.</b>	<b>6:30:01</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975.04 USD
02-05	<b>Draft memo to counsel re: inadvertent production research.</b>	<b>6:03:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:55-15:58	907.5 USD

02-07	<b>Meeting with Nat re: inadvertent production redaction issues; begin prep for Medical Defendants EBTs.</b>	5:00:06	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-16:00	750.25 USD
02-08	<b>Prepare for Medical Defendant's EBTs; review medical chart, record, and deposition summaries; review Beiner's prior litigation testimony.</b>	5:47:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:13-16:00	867.5 USD
02-10	<b>Conference with Howard Suckle re deposition prep; prep for Medical Defendants depositions.</b>	6:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-17:15	937.5 USD
02-11	<b>Bernier Deposition.</b>	9:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-19:00	
02-12	<b>Isakov Deposition.</b>	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:30	
02-20	<b>Research state action under § 1983; draft memo to counsel arguing Dr. Isakov's liability in response to opposing counsel's request to release Isakov from case.</b>	6:13:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:17-16:30	932.5 USD
02-20	<b>Draft memo to counsel re: Dr. Isakov.</b>	2:03:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	20:15-22:18	307.5 USD
03-04	<b>Conference call with City defendants; team conference re trial prep status.</b>	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:30-18:00	225 USD
03-07	<b>Research issues re: City Defendants' March 7, 2014 letter; attorney-client privilege issue; research Fed. R. Evid. 612(b) and Fed. R. Civ Pro 26(b)(3).</b>	5:41:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:17-21:58	852.5 USD
03-08	<b>Research issues City Defendants' March 7, 2014 letter; ten-year limitation issue; unsubstantiated claims issue; objections at depositions generally; time to depose plaintiff (Rule 30(d)(1).</b>	4:39:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:17-16:56	697.5 USD
03-09	<b>Draft Memo to counsel re: City Defendants deposition objection issues.</b>	6:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:35-15:15	1000 USD
03-10	<b>Research defendants assertion of privilege for grand jury subpoenas.</b>	5:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:05-22:19	785 USD
03-11	<b>Review and comment Letter to Judge Sweet; team meeting re discovery issues.</b>	3:22:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:11-20:33	505 USD
03-12	<b>Catalogue and review new discovery at Nat's office.</b>	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975 USD
03-12	<b>Letter to counsel re: search for missing discovery files.</b>	1:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:00-17:00	150 USD
03-14	<b>Draft subject matter for NYPD 30(b)(6) notices.</b>	5:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:35-16:15	850 USD
03-14	<b>Revise proposed jury instructions for City defendants; research Monell custom and policy municipal liability; analyze Monell jury instructions from other jurisdictions; draft alternate instructions; review and collect cases for authority.</b>	5:28:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:35-16:03	820 USD
03-15	<b>Continue with research and drafting NYPD proposed jury instructions; draft charges for supervisor liability, First Amendment retaliation and prior restraint.</b>	6:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-17:15	900 USD

03-16	<b>Research and draft NYPD proposed jury instructions; draft conspiracy and state action charges.</b>	5:53:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:12-16:05	882.5 USD
03-19	<b>Draft NYPD proposed jury instructions; continue state action research re: Medical Defendants.</b>	6:26:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:46-16:12	965 USD
03-21	<b>Research state action re: City defendants section 1983 conspiracy liability.</b>	7:48:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:15-18:03	1170 USD
03-27	<b>Draft subject matter for JHMC 30(b)(6) notices.</b>	5:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:44-14:59	787.5 USD
03-28	<b>Meeting with Nat re: NYPD proposed jury instructions draft.</b>	6:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-18:15	937.5 USD
04-02	<b>Research re: possible medical experts.</b>	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975 USD
04-03	<b>Memo to counsel re: possible medical expert Dr. Peter Stastny, MD.</b>	5:32:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:35-15:07	830 USD
04-04	<b>Research medical experts; review Roy Lubit's filings.</b>	6:51:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:39-16:30	1027.5 USD
04-11	<b>Draft proposed Jury Instructions Medical Defendants; research due process causes of action; dangerousness standard re: emergency civil commitment; statutory and common law procedural protections re: restraints; legal privilege under MHL 9.39.</b>	3:39:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:22-19:01	547.5 USD
04-12	<b>Continue proposed jury instructions for case against Medical Defendants; draft neg per say charges.</b>	5:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-19:30	750 USD
04-13	<b>Team meeting with potential expert, Roy Lubit.</b>	4:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:45-18:00	637.5 USD
04-14	<b>Team conference call with Adrian re status and settlement.</b>	0:40:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-10:40	100 USD
04-14	<b>Continue drafting proposed jury instructions Medical Defendants; draft medical malpractice and other state claims.</b>	4:33:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:00-19:33	682.5 USD
04-16	<b>Conference call with Adrian re trial issues and settlement; team conference to confer.</b>	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-11:30	375 USD
04-17	<b>Team conference call re progress on settlement issues.</b>	1:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-13:15	187.5 USD
04-24	<b>Research re: jury awards of damages.</b>	4:10:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:08-13:18	625 USD
04-24	<b>Research the various state action tests in the context of a private hospital; collect and analyze Second Circuit case law.</b>	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	18:00-22:00	600 USD
04-26	<b>Draft memo to counsel re: state action research.</b>	5:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:14	785 USD
05-13	<b>Prepare EMT Jessica Marquez's deposition; research right to refuse medical attention; right to choice of hospital.</b>	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:15-14:15	600 USD

05-14	<b>EMT Jessica Marquez Deposition.</b>	7:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-17:15	
05-20	<b>Trip to Johnstown to meet with Adrian (6.5 hours of travel time).</b>	11:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	06:00-17:30	1725 USD
05-21	<b>Research re: blue wall of silence police retaliation cases; the deliberative process privilege; the law enforcement privilege.</b>	5:16:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:44-16:00	790 USD
05-23	<b>Blue wall of silence research; analyze and review prior testimony of possible police procedures expert, Dr. Leinen.</b>	6:37:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:26-16:03	992.5 USD
05-24	<b>Review and catalog new discovery production.</b>	3:59:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:46-15:45	597.5 USD
05-25	<b>Analyze case law granting summary judgment on plaintiff's Monell claims connected to practices in Mollen report.</b>	4:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:30-15:30	600 USD
05-26	<b>Draft writeup on blue wall of silence research.</b>	6:14:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:45-15:59	935 USD
05-27	<b>Create Medical defendants evaluation timeline in the ER, psyche ER, and psyche ward.</b>	5:59:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:12-20:11	897.5 USD
05-28	<b>Hearing with Judge Sweet oral arguments on motion.</b>	2:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:00	300 USD
05-28	<b>Prepare Weiss deposition; team conference call re Weiss deposition.</b>	4:06:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:15-17:21	615 USD
05-29	<b>Weiss Deposition.</b>	9:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-19:00	
05-29	<b>Draft summary of Weiss deposition send to counsel; prepare for JHMC 30(b)6 depositions on policy; review Beiner's depo transcript; draft questions.</b>	6:42:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-17:57	1005 USD
05-30	<b>Jamaica Hospital 30 (b)(6) Deposition Maffia.</b>	3:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-13:30	
06-04	<b>Prepare for Ferrara Deposition.</b>	3:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-13:00	450 USD
06-05	<b>Pre-ebt meeting with Ferrara; Ferrara Deposition.</b>	7:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-17:15	
06-06	<b>Draft summary of notes from Ferrara deposition send to counsel; team conference call with police practices experts, Eterno and Silverman re: expert report and testimony.</b>	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-16:30	375 USD
06-09	<b>Team conference call w/ Adrain re trial prep and update.</b>	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-16:00	225 USD
06-13	<b>Team conference call w/ Silverman and Eterno re expert testimony; conference with Nat re conflict of interest issue.</b>	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-11:30	375 USD
06-27	<b>Prep for Mauriello's deposition; review prior deposition; review City defendants depo summaries.</b>	3:59:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:45-14:44	597.5 USD

07-01	<b>Mauriello Deposition.</b>	9:02:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-19:02	
07-02	<b>Prep for Lwin deposition; review Beiner deposition notes and hospital chart.</b>	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	20:00-21:30	225 USD
07-03	<b>Lwin Deposition.</b>	1:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-12:45	
07-07	<b>Jamaica Hospital's 30(b)(6) witness deposition, Dhar.</b>	5:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:30	
07-13	<b>Prep for City 30(b)(6) deposition topics; research anti-quota law, New York Labor Law § 215-a, and Operations Order No. 52.</b>	6:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:00	900 USD
07-15	<b>City 30 (b) (6)Lt. David Wittman Topic B deposition.</b>	1:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-11:15	
07-15	<b>City 30 (b) (6) Lt. Bernard Whalen deposition.</b>	0:45:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:30-14:15	
07-18	<b>Team conference call with expert Dr. Halpren.</b>	2:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-12:00	300 USD
07-22	<b>Research re City's application of subsequent remedial measure; team conference call re status.</b>	3:39:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:14-19:53	547.5 USD
07-24	<b>City 30(b)(6) witness deposition, Cooper.</b>	5:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:30-17:00	
07-24	<b>Prep for Patel deposition.</b>	1:00:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	20:00-21:00	150 USD
07-25	<b>Patel deposition.</b>	2:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:30-13:00	
07-31	<b>Analyze potential withdrawal of claims.</b>	2:09:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:06-15:15	322.5 USD
07-31	<b>Team conference call with experts, Halpern-Ruder and Dr. Lubit.</b>	1:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:00-17:30	225 USD
08-04	<b>Research re: 8/4/14 letter to Judge Sweet; analyze defendants' instruction to witness not to answer questions beyond scope of 30 (b)(6) subject matter issue.</b>	3:05:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:11-18:16	462.5 USD
08-06	<b>Conference call with Nat re: defendant's objection to video; new assignments.</b>	0:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:30-13:00	75 USD
08-09	<b>Review and analyze Dr. Lubit's expert report.</b>	3:08:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:07-13:15	470 USD
08-10	<b>Team conference call with Dr. Lubit re testimony.</b>	1:15:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-12:15	187.5 USD
08-14	<b>Draft response addressing 8.5.14 Letter re: Purpi's 30(b)(6) issues.</b>	4:54:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:13-15:07	735 USD
09-04	<b>Search for missing case citations for Dr. Lubit's prior expert testimony.</b>	2:19:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:05-15:24	347.5 USD

<b>09-12</b>	<b>Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).</b>	<b>8:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-17:00	1200 USD
<b>09-13</b>	<b>Team Meeting weekend in Mayfield, NY.</b>	<b>7:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-17:30	1125 USD
<b>09-14</b>	<b>Team Meeting weekend in Mayfield, NY (including travel time of 4 hours).</b>	<b>8:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-17:00	1200 USD
<b>09-20</b>	<b>Review Medical defendants expert reports; review expert Tancredo's deposition transcripts.</b>	<b>4:37:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:23-17:00	692.5 USD
<b>09-21</b>	<b>Team meeting with Dr. Lubit re: deposition prep.</b>	<b>4:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-15:00	600 USD
<b>10-02</b>	<b>Team conference call re: trial prep.</b>	<b>0:45:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:00-13:45	112.5 USD
<b>10-03</b>	<b>Team meeting Nat's office re upcoming motion papers; conference w/Adrian.</b>	<b>3:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:00-19:00	450 USD
<b>10-18</b>	<b>Research Rule 68; review letter to Adrian re settlement offer.</b>	<b>3:58:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:14-12:12	595 USD
<b>10-19</b>	<b>Conference call w/ team re Rule 68 Offer.</b>	<b>2:15:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-16:15	337.5 USD
<b>10-23</b>	<b>Create claims "cheat sheet" from proposed jury instructions.</b>	<b>5:53:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:07-15:00	882.5 USD
<b>10-23</b>	<b>Review/comment re: Letter Rejecting Rule 68 Offer.</b>	<b>1:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-15:30	150 USD
<b>12-01</b>	<b>Review 2nd Amended Complaint track proposed changes.</b>	<b>4:41:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	18:15-22:56	702.5 USD
<b>12-02</b>	<b>Review Third Amended Complaint; draft proposed addition of malicious abuse of process claim and violation of substantive and procedural due process claims.</b>	<b>4:40:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:32-14:12	700 USD
<b>12-02</b>	<b>Memo of law in support of Motion to Amend; examine and analyze developing caselaw re: respondent superior liability for private corporations under § 1983 (Shields).</b>	<b>7:55:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-19:55	1187.5 USD
<b>12-03</b>	<b>Review final draft memo of law in support of Motion to Amend; Begin research for summary judgment arguments; analyze Second Circuit summary judgment decisions re due process and dangerousness in context of civil commitment; false imprisonment claims.</b>	<b>6:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:30-15:00	975 USD
<b>12-03</b>	<b>Review final draft Third Amended Complaint; review final draft Memo in Support.</b>	<b>5:15:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:45-21:00	787.5 USD
<b>12-11</b>	<b>Meeting Nat's office re:NYPD and Medical Defendants summary judgment claims.</b>	<b>5:15:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-16:30	787.5 USD
<b>12-16</b>	<b>Draft summary judgment issues; analyze Fourth Amendment search and seizure Second Circuit summary judgment decisions.</b>	<b>7:37:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-18:37	1142.5 USD

12-18	<b>Mauriello's Counterclaim issue; analyze tortious interference w/prospective advantage summary judgment decisions.</b>	8:50:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:10-19:00	1325 USD
12-19	<b>Summary judgment Memo in Support; research and analyze Second Circuit decisions determining exigent circumstances; review NYPD Patrol Guide emergency protocol.</b>	5:10:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:35-20:45	775 USD
12-20	<b>Summary judgment motion; review MHL statute provisions, JHMC hospital chart and record.</b>	5:23:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:52-16:15	807.5 USD
12-21	<b>Summary judgment memo in support draft; track comments and caselaw support.</b>	7:22:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:35-18:57	1105 USD
12-22	<b>Review Summary judgment memo in support draft; track comments and changes.</b>	6:30:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:30-15:00	975 USD
12-22	<b>Review final draft Summary Judgment Memo in Support.</b>	3:43:00	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:45-20:28	557.5 USD

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# Detailed report

2015-01-01 - 2015-12-31

Total 472 h 11 min Billable 407 h 06 min 61067.11 USD

Schoolcraft selected as clients

Date	Description	Duration	User
01-04	<b>Review City defendants summary judgment motions; research caselaw cited.</b>	<b>4:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-13:00	600 USD
01-05	<b>Review Medical defendants summary judgment motions; research cited caselaw; conference with Nat re: motions.</b>	<b>5:58:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-15:28	895 USD
01-07	<b>Prepare for opposition papers; draft Medical Defendants' summary judgment issues; analyze cited caselaw.</b>	<b>6:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-21:00	975 USD
01-08	<b>Meeting with Nat re: Medical Defendants summary judgment issues; conduct research on issues.</b>	<b>5:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:30	825 USD
01-09	<b>Research City Defendants summary judgment issues; 4th amendment unlawful search and seizure; legal standard for exigent circumstances; objective reasonableness doctrine; research caselaw deciding summary judgment on qualified immunity grounds; team conference re motions.</b>	<b>6:04:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:46-16:50	910 USD
01-11	<b>Research City Defendants summary judgment issues; probable cause; exculpatory evidence; review EMT emergency protocol ; review caselaw and statutory right to refuse medical treatment; right to hospital preference.</b>	<b>4:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-14:00	600 USD
01-12	<b>Research Medical Defendants summary judgment issues; draft the state action issue; analyze McGugan v. Aldana-Bernier and Doe.</b>	<b>5:33:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:33	832.5 USD
01-14	<b>Research Medical Defendant's summary judgment motion issues; respondeat superior, vicarious liability; apparent authority.</b>	<b>5:23:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:37-16:00	807.5 USD
01-15	<b>Research Medical Defendant's summary judgment issues; review Dr. Lubit's Report for establishing the standard of care.</b>	<b>7:05:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:19-16:24	1062.5 USD
01-16	<b>Continue research on Medical Defendants summary judgment issues; research applicable standard of care; analyze "substantially below" legal standard; review defendants deposition summaries.</b>	<b>6:40:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-15:40	1000 USD
01-21	<b>Continue research on defendants summary judgment issues; conspiracy/joint activity state action liability.</b>	<b>7:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-16:00	1050 USD
01-22	<b>Research re: intracorporate conspiracy doctrine.</b>	<b>6:45:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:11-16:56	1012.5 USD
01-26	<b>Research re: intracorporate doctrine; draft memo to counsel re: intra-Corporate doctrine.</b>	<b>6:25:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:15-16:40	962.5 USD
01-27	<b>Draft memo to counsel re: intracorporate doctrine.</b>	<b>4:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-13:30	675 USD

01-27	<b>Meeting with Nat re:opposition issues; 1st amendment issue.</b>	<b>4:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:00-17:30	675 USD
01-28	<b>Research First Amendment issues; analyze recent development in the law limiting Garcetti (Lane, Griffin, Hagan).</b>	<b>7:01:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-16:01	1052.5 USD
01-29	<b>Research intentional infliction of emotional distress claim.</b>	<b>4:43:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:17-14:00	707.5 USD
01-29	<b>Continue IIED research; IIED claim not duplicative of the other claims issue.</b>	<b>3:25:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:35-19:00	512.5 USD
02-01	<b>Memo to counsel re: IIED research.</b>	<b>6:50:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:50	1025 USD
02-02	<b>Research First Amendment issues; Monell research.</b>	<b>8:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-18:00	1200 USD
02-03	<b>Monell research; review and brief cases on police retaliation to establish policy under Monell; review and brief case law re establishing deliberate indifference under Monell.</b>	<b>6:03:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-15:03	907.5 USD
02-04	<b>Memo to counsel re: Monell research.</b>	<b>6:04:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-15:04	910 USD
02-05	<b>Continue to research Medical Defendants Memo in Opposition issues; research defendant's argument of legal justification to confine plaintiff under EMTALA.</b>	<b>6:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:30-16:00	975 USD
02-06	<b>Draft opposition to Medical Defendants summary judgment arguments.</b>	<b>5:36:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:30-21:06	840 USD
02-07	<b>Draft opposition to Medical Defendants summary judgment arguments.</b>	<b>7:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:30-22:00	1125 USD
02-08	<b>Call with Nat discuss current status on JHMC opposition issues.</b>	<b>0:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-14:30	75 USD
02-09	<b>Call with Nat re: progress on research Medical defendants issues.</b>	<b>0:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:15-13:45	75 USD
02-10	<b>Draft opposition to JHMC summary judgment arguments.</b>	<b>4:34:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:26-16:00	685 USD
02-10	<b>Draft opposition to JHMC summary judgment motions.</b>	<b>2:49:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:11-20:00	422.5 USD
02-11	<b>Review and track proposed changes on first draft of Motion in Opposition.</b>	<b>5:39:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:21-15:00	847.5 USD
02-11	<b>Review/edit second draft of Motion in Opposition.</b>	<b>3:45:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:15-21:00	562.5 USD
02-13	<b>Review all defendants motions in opposition submissions; Meeting with Nat to discuss submissions.</b>	<b>6:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:30-16:30	900 USD
02-14	<b>Draft issues re: reply to Mauriello opposition motion.</b>	<b>5:14:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:46-19:00	785 USD

02-15	<b>Reply to Mauriello opp; research tortious interference with prospective relations claim; wrongful means constituting tortious conduct; malice intent as the "sole motivation" for plaintiff's alleged interference.</b>	<b>5:58:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:52-15:50	895 USD
02-16	<b>Reply to Mauriello opposition motion; research defamation and damages.</b>	<b>4:18:22</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:23-19:41	645.92 USD
02-17	<b>Draft portion of reply to Mauriello opposition motion.</b>	<b>6:13:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:13-16:26	932.5 USD
02-19	<b>Draft reply to Mauriello opposition motion.</b>	<b>4:14:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:51-17:05	635 USD
02-20	<b>Team meeting; meet with Norinsberg and new team.</b>	<b>4:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-14:30	675 USD
02-23	<b>Draft issues re: reply to Medical defendants memo in opp.</b>	<b>7:00:05</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:01-21:01	1050.21 USD
02-24	<b>reply to Medical defendants memo in opp.</b>	<b>7:11:49</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:29-22:40	1079.54 USD
02-25	<b>Research sham affidavit doctrine.</b>	<b>3:49:05</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:29-16:18	572.71 USD
02-26	<b>Memo to counsel re; sham affidavit doctrine research.</b>	<b>4:20:12</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:28-16:49	650.5 USD
02-27	<b>Research re: inadmissibility of hearsay on summary judgment motions.</b>	<b>4:41:54</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:15-16:56	704.75 USD
02-28	<b>Draft issues re: reply to City memo in opposition.</b>	<b>6:05:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	05:35-11:40	912.5 USD
03-02	<b>Research re: collective knowledge doctrine.</b>	<b>3:56:19</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:34-12:30	590.79 USD
03-03	<b>Memo to counsel re: collective knowledge doctrine research.</b>	<b>5:10:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-15:10	775 USD
03-05	<b>Review and track proposed changes to Reply motion draft.</b>	<b>5:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:30-21:00	825 USD
03-06	<b>Final review/edit of Reply papers.</b>	<b>4:02:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-13:02	605 USD
03-07	<b>Prepare police expert Prof. Eterno deposition summary.</b>	<b>5:03:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-16:03	757.5 USD
03-08	<b>Prepare police expert Prof. Eterno's deposition summary.</b>	<b>7:03:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-16:03	1057.5 USD
03-09	<b>Draft Eterno Deposition Summary; team conference call.</b>	<b>6:55:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:55	1037.5 USD
03-10	<b>Draft Prof. Eterno deposition summary.</b>	<b>5:55:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:05-22:00	887.5 USD
03-11	<b>Prepare Prof. Eterno deposition summary.</b>	<b>6:06:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-16:06	915 USD

<b>03-12</b>	<b>Prepare Prof. Etero deposition summary.</b>	<b>4:50:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:00-12:50	725 USD
<b>03-12</b>	<b>Meeting with Team re new issues on reply.</b>	<b>3:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:00-19:00	450 USD
<b>03-12</b>	<b>Revise NYPD jury instructions; distribute revised charges to counsel.</b>	<b>1:44:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	20:00-21:44	260 USD
<b>03-13</b>	<b>Meeting Nat's office with new team re division of upcoming work.</b>	<b>4:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-18:00	600 USD
<b>03-16</b>	<b>Review Defendants Reply memos.</b>	<b>3:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:00-12:00	450 USD
<b>03-16</b>	<b>Draft Prof. Etero's direct examination for trial.</b>	<b>2:06:57</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:22-16:28	317.37 USD
<b>03-17</b>	<b>Review/comment March 17 Letter to the court.</b>	<b>1:12:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:02-12:14	180 USD
<b>03-18</b>	<b>Draft Prof. Etero's direct examination for trial.</b>	<b>6:28:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:33-16:01	970 USD
<b>03-19</b>	<b>Draft Prof. Etero's direct examination for trial.</b>	<b>4:15:54</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	22:44-03:00	639.75 USD
<b>03-20</b>	<b>Draft Prof. Etero's direct examination for trial.</b>	<b>3:37:19</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:17-16:54	543.29 USD
<b>03-25</b>	<b>Conference call w/ Nat re: status and assignments moving forward.</b>	<b>0:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-14:30	75 USD
<b>03-26</b>	<b>Team meeting at Nat's new office; review Prof. Etero's direct examination outline.</b>	<b>5:00:54</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:29-17:30	752.25 USD
<b>03-28</b>	<b>Draft proposed jury instructions for claims against Medical Defendants; draft charges for medical malpractice and other state claims.</b>	<b>6:35:58</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:16-21:51	989.92 USD
<b>03-29</b>	<b>Draft proposed jury instructions for Medical Defendants; draft state false imprisonment charge.</b>	<b>5:39:57</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:36-19:16	849.87 USD
<b>03-29</b>	<b>Make changes to diagram of the Glendale apt.</b>	<b>1:41:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	22:20-00:01	252.5 USD
<b>03-30</b>	<b>Call with Nat re: Glendale diagram/jury charges.</b>	<b>0:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	15:30-16:00	75 USD
<b>03-31</b>	<b>Draft proposed jury instructions Medical Defendants; draft corporate negligence charge.</b>	<b>5:33:39</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:18-19:52	834.12 USD
<b>04-01</b>	<b>Draft proposed jury instructions for claims against Medical Defendants; draft charge re: the stigma of an involuntary commitment; charge instructing requirement of a sufficient investigation of dangerousness; damages</b>	<b>5:40:02</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:04-19:44	850.08 USD
<b>04-02</b>	<b>Trial Team meeting re trial prep, jury instructions.</b>	<b>0:03:30</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-12:03	8.75 USD

04-03	<b>Combine NYPD and Medical Defendants Jury Instructions.</b>	<b>3:56:54</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:15-15:12	592.25 USD
04-06	<b>Combine NYPD and Medical Defendants Jury Instructions.</b>	<b>6:20:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:29-15:49	950 USD
04-08	<b>Revise jury instructions Medical Defendants incorporating Nat's edits; conference w/ team.</b>	<b>5:47:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:33-14:20	867.5 USD
04-10	<b>Call with Nat re: progress on current projects.</b>	<b>0:45:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-14:45	112.5 USD
04-13	<b>Conference with Judge Sweet; team conference.</b>	<b>2:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:30	375 USD
05-05	<b>Review of Court's Opinion re: summary judgment motions.</b>	<b>1:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	19:30-20:30	150 USD
05-12	<b>Conference with Judge Sweet; Trial team meeting re status.</b>	<b>3:30:01</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:30-16:00	525.04 USD
05-27	<b>Draft motion for reconsideration issues; research post-suspension First Amendment claim; review cross examination outlines for defendants.</b>	<b>6:09:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:36-15:45	922.5 USD
05-28	<b>Analyze Second Circuit freedom-of-speech cases (Jackler, Gacetti, Walsh); conference call w/ Nat re reconsideration motion.</b>	<b>4:20:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:40-14:00	650 USD
05-31	<b>Memo to counsel re: post-suspension retaliation claim.</b>	<b>4:47:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:43-14:30	717.5 USD
06-01	<b>Review letter to Judge for reconsideration draft; track changes; research issue of qualified immunity in a First Amendment retaliation case.</b>	<b>6:55:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:50-15:45	1037.5 USD
06-02	<b>Memo to counsel re: qualified immunity and "clearly established" law doctrine.</b>	<b>4:15:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	08:45-13:00	637.5 USD
09-15	<b>Review cross examination of defendants outlines; review/comment on client memo.</b>	<b>4:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	17:30-22:00	675 USD
09-16	<b>Research Rule 68 issue; research offset issue; general obligations law 15-108.</b>	<b>2:15:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:00-12:15	337.5 USD
10-07	<b>Judge Sweet hearing; conference with Medical Defendants.</b>	<b>2:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-13:00	
10-08	<b>Meeting at Nat's office; review Motion in Lim Opposition issues.</b>	<b>5:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-17:30	
10-09	<b>Draft portion of Motion in Lim Opposition; research issues on admissibility of expert testimony.</b>	<b>6:58:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:17-17:15	
10-10	<b>Draft portion of Motion in Lim Opp; research Daubert and reliability standards.</b>	<b>5:09:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:03-14:12	
10-10	<b>Motion in Lim Opp; research expungement of medical records; research criminal liability under 18 USCS § 922(g)(4) for possession of gun by person who has been committed to mental institution.</b>	<b>3:23:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	16:30-19:53	

<b>10-14</b>	<b>Meeting with Defendant's (motion in lim opp)/Hearing Judge Sweet.</b>	<b>1:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:30-13:00	
<b>10-16</b>	<b>Meeting with Defendant's (settlement)/Judge Sweet Chambers settlement discussion.</b>	<b>3:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-14:00	
<b>10-21</b>	<b>Hearing with Judge sweet; oral arguments for Motion in Lim opposition.</b>	<b>1:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	11:00-12:30	
<b>10-21</b>	<b>Meeting Nat's office; discuss new issues.</b>	<b>2:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-16:00	
<b>10-23</b>	<b>Meet with Nat's revised Jury Instructions.</b>	<b>3:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-17:00	
<b>10-24</b>	<b>Final draft proposed jury Instructions.</b>	<b>6:34:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:26-16:00	
<b>10-24</b>	<b>Final draft proposed jury Instructions.</b>	<b>6:06:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	09:54-16:00	
<b>10-25</b>	<b>Final draft proposed jury Instructions.</b>	<b>2:55:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:45-13:40	
<b>10-29</b>	<b>Hearing with Judge Sweet; settlement meeting with defendants.</b>	<b>2:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	13:30-16:00	
<b>10-31</b>	<b>Work with Nat re prepping Lubit for trial.</b>	<b>3:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	14:00-17:30	
<b>11-01</b>	<b>Prep Roy Lubit for trial.</b>	<b>5:30:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	12:00-17:30	
<b>11-03</b>	<b>Settlement meeting with Judge Sweet and Adrian.</b>	<b>4:00:00</b>	Magdalena Bauza
	Schoolcraft - Schoolcraft case	10:30-14:30	

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